

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

WILLIAM F. DAVIS, III,	)	C. A. No. 04-209-SLR
	)	
Plaintiff,	)	
v.	)	TRIAL BY JURY
	)	DEMANDED
CORRECTIONAL MEDICAL SERVICES,	)	
INC., <u>et al.</u> ,	)	
	)	
Defendants.	)	

**RESPONSE OF DEFENDANT, CORRECTIONAL MEDICAL SERVICES, INC., TO  
PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

1. "Any and all medical records of Plaintiff from the time of surgery a rupture Hernia done by Dr. Mammen Sept. 30, 2002 Gander Hill Prison."

**RESPONSE:**

Not applicable to Correctional Medical Services, Inc. as Correctional Medical Services, Inc. was not the health care provider in question on September 30, 2002.

2. "A written affidavit from Mr. Mammen about my rupture."

**RESPONSE:**

See response to request to produce number 1 above.

MARSHALL, DENNEHEY, WARNER,  
COLEMAN & GOGGIN

BY: /s/ Kevin J. Connors  
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Dated: January 3, 2008  
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